

hazardous • waste • facility • approval • board

James A. Rhodes, Governor  
Wayne S. Nichols, Chairman

US EPA RECORDS CENTER REGION 5



451377

**hwfab**

P.O. Box 1049  
361 E. Broad St.  
Columbus, Ohio 43216  
(614) 462-6981

Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146

Re: Permit No. 02-18-0315

Attn: Robert L. Hukill

**DEC 17 1981**

Dear Permittee:

Transmitted herewith is a certified copy of your Hazardous Waste Facility Installation and Operation Permit (Permit) as such permit was entered into the Journal of the Board. The permit consists of the following:

- 1) The standardized permit form (Findings and Conclusions and Issuance).
- 2) Terms and Conditions as approved by the Board (Special Terms and Conditions applicable to all permittees and Special Terms and Conditions for specific facilities).
- 3) Portions of the approved Part A permit application indicating the approved hazardous waste processes and design capacities and those hazardous wastes, identified by U.S. EPA Hazardous Waste Number, to be managed at the facility.

Processes, design capacities, and/or specific hazardous wastes which are stricken through or crossed out on the Part A permit application are not included in the approved permit. Unless otherwise notified by certified mail and afforded the opportunity for an adjudication hearing before the Board, all such deletions have occurred with the authorization of the applicant or his representative.

You are encouraged to carefully read the permit in its entirety. Any questions or comments concerning its content should be addressed to:

Ms. Peggy J. Vince  
Executive Director  
Hazardous Waste Facility Approval Board  
P.O. Box 1049  
361 East Broad Street  
Columbus, OH 43216  
Ph: (614) 462-6981

HAZARADOUS WASTE FACILITY  
APPROVAL BOARD

**DEC 17 1981**

ENTERED BOARD'S JOURNAL

YOU ARE HEREBY ADVISED THAT: All appeals of these matters are to the Court of Appeals of Franklin County, 369 South High St., Columbus, Ohio 43215, Attn: Deputy Clerk, and shall be pursuant to the provisions of Section 3734.05(C)(7) of the Revised Code.

Sincerely,

*Peggy J. Vince*

Peggy J. Vince  
Executive Director

PJV/ss

Enclosure

HAZARADOUS WASTE FACILITY  
APPROVAL BOARD

DEC 17 1981

ENTERED BOARD'S JOURNAL

TERMS AND CONDITIONS (General)

1. Only those hazardous wastes as identified by the U.S. EPA Hazardous Waste Number(s) set forth in the approved permit application, attached hereto, may be managed at the facility and only pursuant to the specified processes and design capacities indicated and set forth in the approved permit application.
2. The Permittee and the facility shall comply with all applicable performance standards adopted by the Director of Environmental Protection pursuant to Division (D) of Section 3734.12 of the Revised Code.
3. The Permittee and the facility shall comply with all applicable requirements of Chapter 3734 of the Revised Code, the Ohio Hazardous Waste Rules, and the federal statutes and regulations concerning hazardous waste.
4. This permit shall expire three years after its date of issuance. The date of issuance is the date the resolution to issue the permit was passed by the Board.
5. This permit, in accordance with the procedures of the Board, may be modified, revoked, or alternatively revoked and reissued, to comply with applicable provisions of Chapter 3734 of the Revised Code or the Ohio Hazardous Waste Rules.
6. The annual permit fee, payable to the Treasurer of State, shall be submitted to and received by the Board on or before the anniversaries of the date of issuance, during the term of the permit.
7. Unless otherwise specifically provided, all studies, reports, data, plans and other information required to be submitted by this permit shall be transmitted to:

Hazardous Waste Facility Approval Board  
P.O. Box 1049  
361 East Broad Street  
Columbus, Ohio 43216

The permit number shall be indicated on the transmittal letter.

TERMS AND CONDITIONS (Special)

NOT APPLICABLE

HAZARADOUS WASTE FACILITY  
APPROVAL BOARD

DEC 17 1981

ENTERED BOARD'S JOURNAL

FOR OFFICIAL USE ONLY  
APPLICATION APPROVED DATE RECEIVED (yr., mo., & day)  
COMMENTS

II. FIRST OR REVISED APPLICATION  
Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)  
☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)  
☐ 2. NEW FACILITY (Complete item below.)  
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)  
B. REVISED APPLICATION (place an "X" below and complete item 1 above)  
☒ 1. FACILITY HAS INTERIM STATUS  
☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

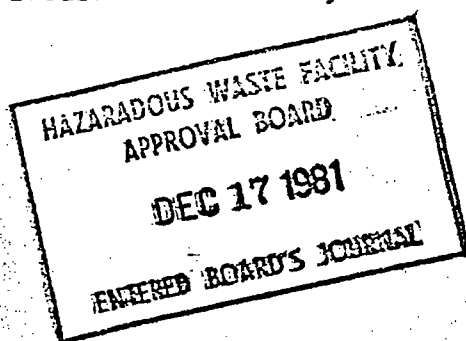
B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.  
1. AMOUNT - Enter the amount.  
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

| PROCESS                        | PROCESS CODE         | APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY                                 | PROCESS   | PROCESS CODE         | APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY |
|--------------------------------|----------------------|--|---|----------------------|--|
| Storage:                       |                      |  | Treatment:  |                      |  |
| CONTAINER (barrel, drum, etc.) | S01                  | GALLONS OR LITERS  | TANK  | T01                  | GALLONS PER DAY OR LITERS PER DAY                        |
| TANK                           | S02                  | GALLONS OR LITERS  | SURFACE IMPOUNDMENT   | T02                  | GALLONS PER DAY OR LITERS PER DAY                        |
| WASTE PILE                     | S03                  | CUBIC YARDS OR CUBIC METERS  | INCINERATOR   | T03                  | TONS PER HOUR OR METRIC TONS PER HOUR                    |
| SURFACE IMPOUNDMENT            | S04                  | GALLONS OR LITERS  | OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.) | T04                  | GALLONS PER DAY OR LITERS PER DAY                        |
| Disposal:                      |                      |  |   |                      |  |
| INJECTION WELL                 | D79                  | GALLONS OR LITERS  |   |                      |  |
| LANDFILL                       | D80                  | ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER |   |                      |  |
| LAND APPLICATION               | D81                  | ACRES OR HECTARES  |   |                      |  |
| OCEAN DISPOSAL                 | D82                  | GALLONS PER DAY OR LITERS PER DAY  |   |                      |  |
| SURFACE IMPOUNDMENT            | D83                  | GALLONS OR LITERS  |   |                      |  |
| UNIT OF MEASURE                | UNIT OF MEASURE CODE | UNIT OF MEASURE  | UNIT OF MEASURE   | UNIT OF MEASURE CODE | UNIT OF MEASURE CODE                                     |
| GALLONS                        | G                    | LITERS PER DAY   | L   |                      |  |
| LITERS                         | L                    | TONS PER HOUR  | D   |                      |  |
| CUBIC YARDS                    | Y                    | METRIC TONS PER HOUR   | W   |                      |  |
| CUBIC METERS                   | C                    | GALLONS PER HOUR   | E   |                      |  |
| GALLONS PER DAY                | U                    | LITERS PER HOUR  | H   |                      |  |

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP  
X-1 S 0 2 600 G  
X-2 T 0 3 20 E  
1 S 0 1 55,000 G  
2 S 0 2 150,000 G  
3 T 0 4 12,500 U  
4 Reclamation  
HAZARADOUS WASTE FACILITY  
APPROVAL BOARD  
DEC 17 1981  
ENTERED BOARD'S JOURNAL

We operate a Resource Recovery Facility incorporating both vacuum flash and atmospheric fractional distillation processes. Capacity approximately 3 million gallons per year total. Materials processed are received as commercial solvent by-product streams which are recycled back to industry as industrial solvent blends and heavier fractions converted and blended into residual fuels and returned to industry.



### DESCRIPTION OF HAZARDOUS WASTES

**EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

| ENGLISH UNIT OF MEASURE | CODE | METRIC UNIT OF MEASURE | CODE |
|-------------------------|------|------------------------|------|
| POUNDS.....             | P    | KILOGRAMS.....         | K    |
| TONS.....               | T    | METRIC TONS.....       | M    |

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

### PROCESSES

#### 1. PROCESS CODES:

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous waste:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**SAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

| LINE NUMBER | A. EPA HAZ. WASTE NO.<br>(enter code) | B. ESTIMATED ANNUAL QUANTITY OF WASTE | C. UNIT OF MEASURE<br>(enter code) | D. PROCESSES                |  |
|-------------|---------------------------------------|---------------------------------------|------------------------------------|-----------------------------|--|
|             |                                       |                                       |                                    | 1. PROCESS CODES<br>(enter) | 2. PROCESS DESCRIPTION<br>(if a code is not entered in D(1)) |
| X-1         | A 0 5 4                               | 900                                   | P                                  | T 0 3 D 8 0                 |  |
| X-2         | D 0 0 2                               | 200                                   | P                                  | T 0 3 D 8 0                 |  |
| X-3         | D 0 0 1                               | 100                                   | P                                  | T 0 3 D 8 0                 |  |
| X-4         | D 0 0 2                               |                                       |                                    |                             | included with above  |

I. EPA I.D. NUMBER: 001926740

II. FACILITY NAME: HUKILL CHEMICAL CORPORATION

V. FACILITY MAILING ADDRESS: 7013 KRICK ROAD, BEDFORD, OHIO 44146

VI. FACILITY LOCATION: PLEASE PLACE LABEL IN THIS SPACE (Same)

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

| SPECIFIC QUESTIONS   | MARK "X" |    |               | SPECIFIC QUESTIONS   | MARK "X" |    |               |
|--|----------|----|---------------|--|----------|----|---------------|
|  | YES      | NO | FORM ATTACHED |  | YES      | NO | FORM ATTACHED |
| A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)   |          | X  |               | B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)  |          | X  |               |
| C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)  |          | X  |               | D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)  |          | X  |               |
| E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)   | X        |    |               | F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)   |          | X  |               |
| G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4) |          | X  |               | H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)  |          | X  |               |
| I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)                 |          | X  |               | J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5) |          | X  |               |

III. NAME OF FACILITY: HUKILL CHEMICAL CORPORATION

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title): ROBERT L. HUKILL, GENERAL MANAGER

B. PHONE (area code & no.): 216 232 9400

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX: 7013 KRICK ROAD

B. CITY OR TOWN: BEDFORD

C. STATE: OH

D. ZIP CODE: 44146

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: 7013 KRICK ROAD

B. COUNTY NAME: CUYAHOGA

C. CITY OR TOWN: BEDFORD

D. STATE: OH

E. ZIP CODE: 44146

F. COUNTY CODE (if known): CUY

APPROVAL BOARD

DEC 17 1981

ENTERED BOARD'S JOURNAL

|   |  |   |  |
|---|--|---|--|
| A. FIRST<br>(specify)<br>7 3 9 0 SOLVENT RECYCLING  |  | B. SECOND<br>(specify)<br>7 5 1 6 1 CHEMICAL DISTRIBUTION |  |
| C. THIRD<br>(specify)<br>2 8 9 1 CHEMICAL PACKAGING |  | D. FOURTH<br>(specify)<br>7                               |  |

OPERATOR INFORMATION

|  |   |
|--|---|
| A. NAME<br>HUKILL CHEMICAL CORPORATION | B. Is the name listed in Item VIII-A also the owner?<br><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
|--|---|

|  |   |
|--|---|
| C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)<br>FEDERAL M = PUBLIC (other than federal or state)<br>STATE O = OTHER (specify)<br>PRIVATE P (specify) | D. PHONE (area code & no.)<br>2 1 6 2 3 2 9 4 0 0 |
|--|---|

|   |
|---|
| E. STREET OR P.O. BOX<br>113 KRICK ROAD |
|---|

|                            |                |                          |   |
|----------------------------|----------------|--------------------------|---|
| F. CITY OR TOWN<br>BEDFORD | G. STATE<br>OH | H. ZIP CODE<br>4 4 1 4 6 | I. INDIAN LAND<br>Is the facility located on Indian lands?<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
|----------------------------|----------------|--------------------------|---|

EXISTING ENVIRONMENTAL PERMITS

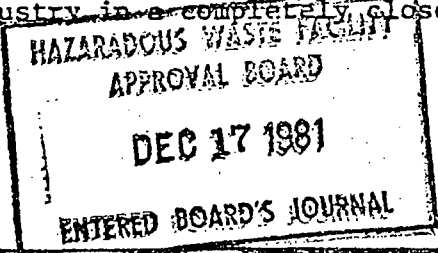
|   |   |
|---|---|
| A. NPDES (Discharges to Surface Water)<br>F 3 3 6 A D | C. PSD (Air Emissions from Proposed Sources)<br>9 P |
| B. UIC (Underground Injection of Fluids)<br>J I       | E. OTHER (specify)<br>(specify)                     |
| D. RCRA (Hazardous Wastes)<br>R I                     | F. OTHER (specify)<br>(specify)                     |

MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

NATURE OF BUSINESS (provide a brief description)

We are distributors of industrial acids, alkalis and solvents. Also in connection with this report and the attached Hazardous Waste Permit Application, we are a "Resource Recovery Facility" actively engaged in recycling byproduct streams back to industry in a completely closed loop system.



I. CERTIFICATION (See instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

|  |  |                           |
|--|--|---------------------------|
| A. NAME & OFFICIAL TITLE (type or print)<br>EMORY G. HUKILL, PRESIDENT | B. SIGNATURE<br><i>Emory G. Hukill</i> | C. DATE SIGNED<br>11/6/80 |
|--|--|---------------------------|

COMMENTS FOR OFFICIAL USE ONLY

W O H D 0 0 1 9 2 6 7 4 0

W

DUP

2

DUP

## IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

| LINE NO. | A. EPA HAZARD. WASTE NO. (enter code) | B. ESTIMATED ANNUAL QUANTITY OF WASTE | C. UNIT OF MEASURE (enter code) | D. PROCESSES             |   |
|----------|---------------------------------------|---------------------------------------|---------------------------------|--------------------------|---|
|          |                                       |                                       |                                 | 1. PROCESS CODES (enter) | 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) |
| 1        | F 0 0 1                               | 1,000,000                             | G                               | S 0 1 S 0 2 F 0 4        | Storage and Processing for                                |
| 2        | F 0 0 2                               | included above                        | G                               |                          | recycling   |
| 3        | F 0 0 3                               | " "                                   | G                               |                          |   |
| 4        | F 0 0 4                               | " "                                   | G                               |                          |   |
| 5        | F 0 0 5                               | " "                                   | G                               |                          |   |
| 6        | Other                                 | 1,500,000                             | G                               | S 0 1 S 0 2              |   |
| 7        | F 0 0 5                               |                                       |                                 |                          |   |
| 8        |                                       |                                       |                                 |                          |   |
| 9        |                                       |                                       |                                 |                          |   |
| 10       |                                       |                                       |                                 |                          |   |
| 11       |                                       |                                       |                                 |                          |   |
| 12       |                                       |                                       |                                 |                          |   |
| 13       |                                       |                                       |                                 |                          |   |
| 14       |                                       |                                       |                                 |                          |   |
| 15       |                                       |                                       |                                 |                          |   |
| 16       |                                       |                                       |                                 |                          |   |
| 17       |                                       |                                       |                                 |                          |   |
| 18       |                                       |                                       |                                 |                          |   |
| 19       |                                       |                                       |                                 |                          |   |
| 20       |                                       |                                       |                                 |                          |   |
| 21       |                                       |                                       |                                 |                          |   |
| 22       |                                       |                                       |                                 |                          |   |
| 23       |                                       |                                       |                                 |                          |   |
| 24       |                                       |                                       |                                 |                          |   |
| 25       |                                       |                                       |                                 |                          |   |
| 26       |                                       |                                       |                                 |                          |   |

as per  
conversation  
with Hukill

\* Note: This covers a large variety of non halogenated solvent blends typically known as paint and lacquer thinners.

HAZARADOUS WASTE FACILITY  
APPROVAL BOARD  
DEC 17 1981  
ENTERED BOARD'S JOURNAL



# IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

## HAZARADOUS WASTE FACILITY APPROVAL BOARD

DEC 17 1981

ENTERED BOARD'S JOURNAL

EPA I.D. NO. (enter from page 1)

### V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

### VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

### VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

41 22 22

LONGITUDE (degrees, minutes, & seconds)

81 31 45

### VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & number)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

### IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Emory G. Hukill

B. SIGNATURE

Emory G. Hukill

C. DATE SIGNED

11/6/80

### X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Emory G. Hukill

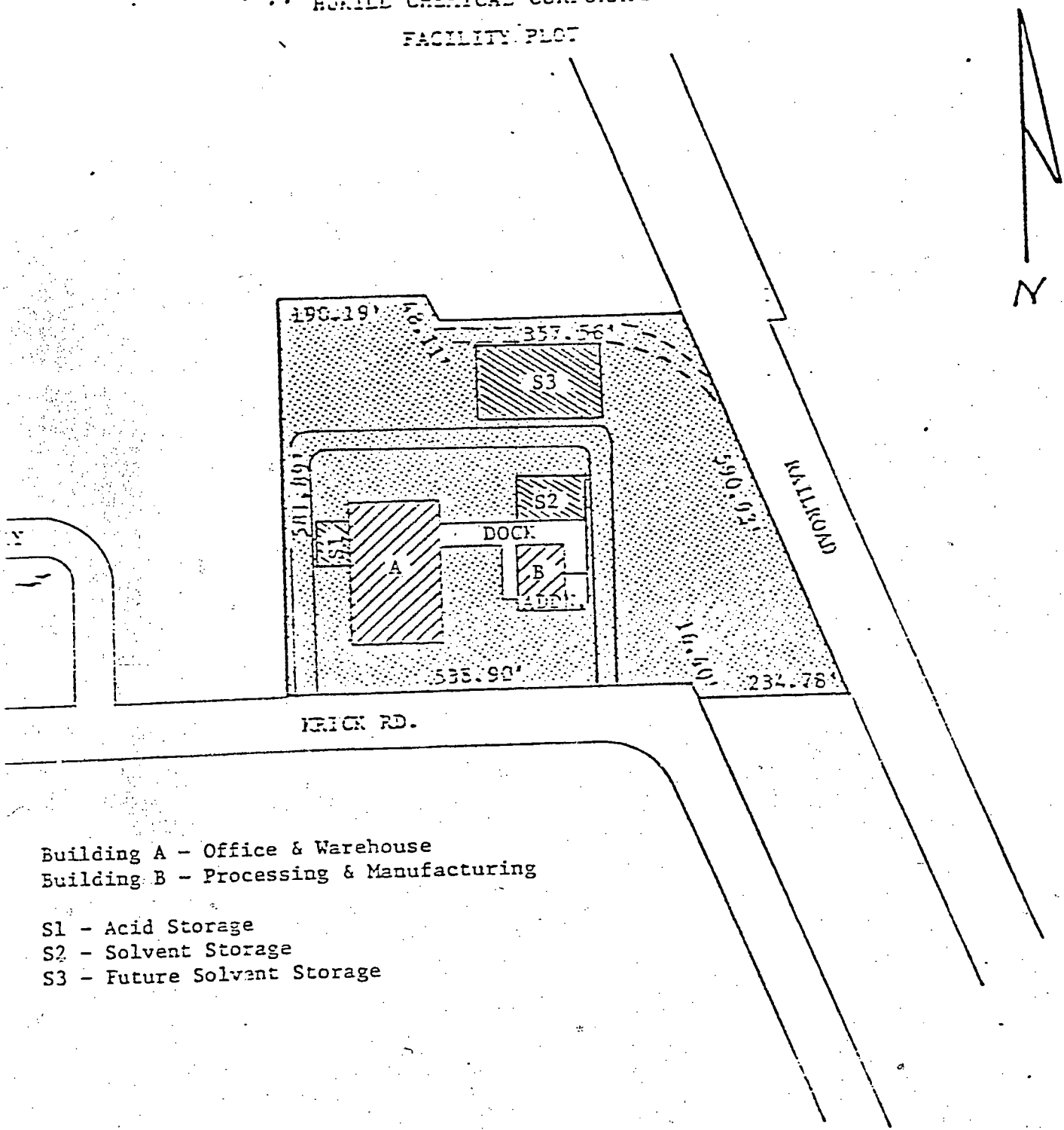
B. SIGNATURE

Emory G. Hukill

C. DATE SIGNED

11/6/80

HUKILL CHEMICAL CORPORATION  
FACILITY PLOT



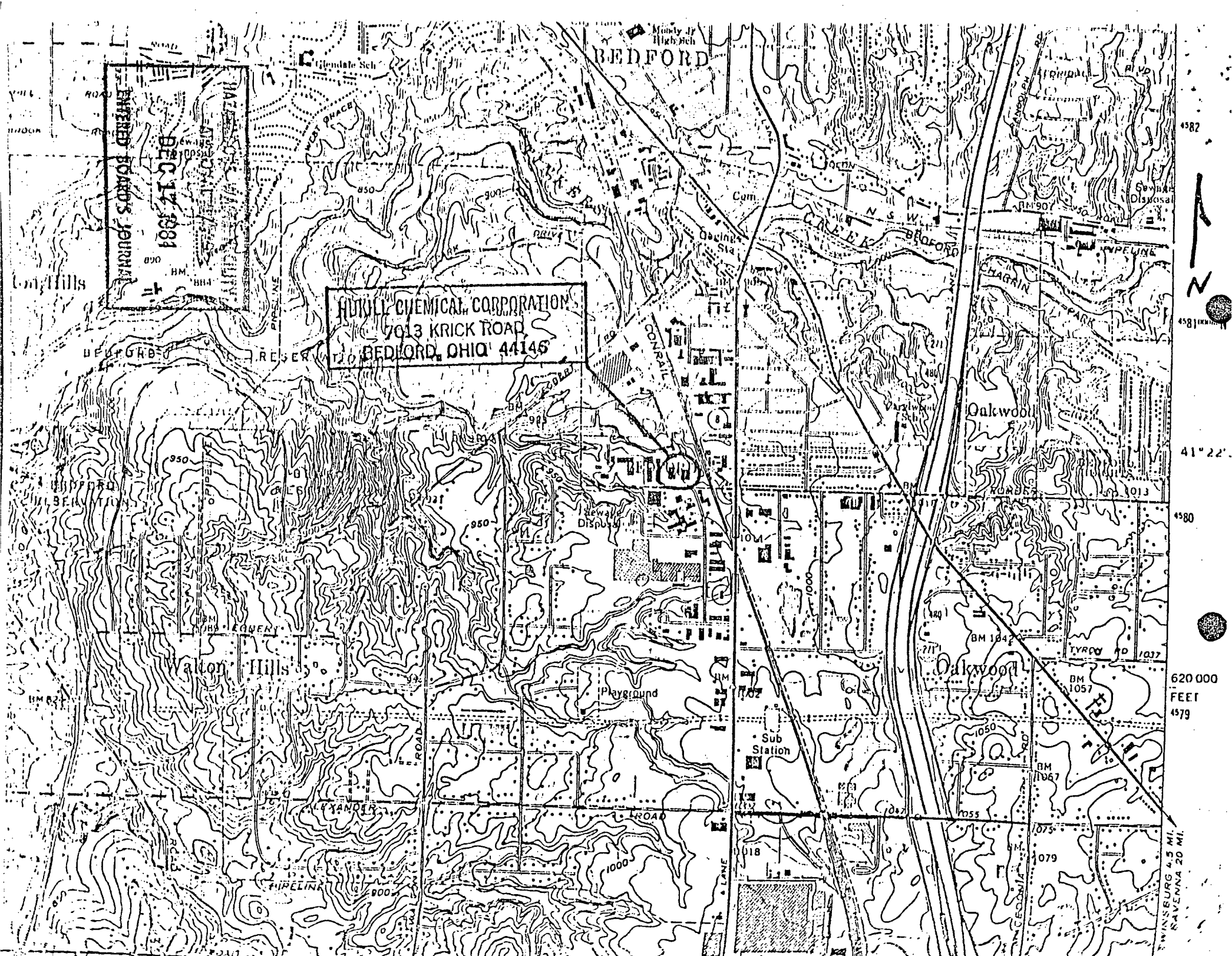
- Building A - Office & Warehouse
- Building B - Processing & Manufacturing
- S1 - Acid Storage
- S2 - Solvent Storage
- S3 - Future Solvent Storage

HUKILL CHEMICAL CORPORATION  
7013 KRICK ROAD  
BEDFORD, OHIO 44146

HAZARDOUS WASTE FACILITY  
APPROVAL BOARD  
DEC 17 1981  
ENTERED BOARD'S JOURNAL

ENTERED BOARD'S JOURNAL  
DEC 17 1981

HUTCHINS CHEMICAL CORPORATION  
7013 KRICK ROAD  
BEDFORD, OHIO 44146



4582

4581

41° 22'

4580

620 000  
FEET  
4579

TWINSBURG 4.5 MI.  
NAVENNA 20 MI.

STATE OF OHIO

HAZARDOUS WASTE FACILITY APPROVAL BOARD

In the Matter of:

Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146

Permit No. 02-18-0315

Applicant/Permittee

The operator of the below-  
referenced hazardous waste  
facility

Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146

Facility

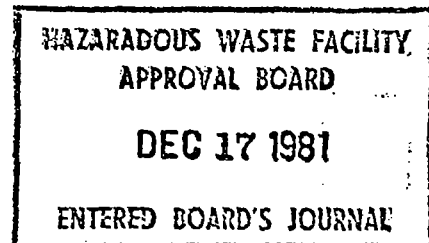
HAZARADOUS WASTE FACILITY  
APPROVAL BOARD  
DEC 17 1981  
ENTERED BOARD'S JOURNAL

Pursuant to Section 3734.05(D) of the Revised Code, The  
Hazardous Waste Facility Approval Board (Board) makes the  
following Findings and Conclusions and issues a Hazardous  
Waste Facility Installation and Operation Permit (Permit)

FINDINGS AND CONCLUSIONS

1. The Applicant has submitted to the Board a completed permit application, stating the facility was in operation immediately prior to October 9, 1980, and has paid the required permit fee.
2. The Ohio Environmental Protection Agency (Agency) and/or the United States Environmental Protection Agency has inspected the facility and has prepared an Interim Status Standards Survey (survey).
3. All public comments timely received have been reviewed, evaluated and considered by the Board and the Agency for their relevancy and materiality.
4. The Agency has reviewed and considered the information on the permit application, the results of the survey, the public comments, and other pertinent material and has concluded that the facility was in substantial compliance, as determined by the Director of Environmental Protection, with applicable statutes and rules in effect immediately prior to October 9, 1980.

5. The Agency has informed the Applicant of the requirements of applicable hazardous waste rules of which it was not in compliance.
6. The Agency has recommended to the Board that a permit be issued to the facility.
7. Review and consideration of the information on the permit application, the results of the survey, the public comments, recommendations and comments by the Agency, and other pertinent material regarding the Applicant and the facility is sufficient to determine whether the facility meets the requirements for permit issuance set forth in Section 3734.05(D) of the Revised Code.
8. The staff of the Board has reviewed and considered the information on the permit application, the results of the survey, the public comments, the recommendation and comments by the Agency, and other pertinent material regarding the Applicant and the facility and has recommended to the Board that a permit be issued.
9. Pursuant to Resolution No. 82 -81, passed September 24, 1981, the Board found that the facility:
  - a. Was in operation immediately prior to October 9, 1980,
  - b. Was in substantial compliance, as determined by the Director of Environmental Protection, with applicable statutes and rules in effect immediately prior to October 9, 1980,
  - c. Submitted a completed permit application, and
  - d. Has demonstrated to the Board that its operation after October 9, 1980 will comply with applicable performance standards adopted by the Director of Environmental Protection pursuant to division (D) of Section 3734.12 of the Revised Code.
10. Pursuant to such Resolution, the Board resolved and approved that a permit be issued with such standard terms and conditions set forth in the document entitled "Terms and Conditions" attached to the Resolution and such special terms and conditions as were approved by the Board.
11. The terms and conditions referenced in Finding Number 10 above, are attached hereto and incorporated herein.
12. Resolution No. 21-81, passed on August 26, 1981 and entered into the Journal of the Board on September 1, 1981, authorizes the Coordinator of the Board to:



- a. Authorize the staff of the Board to issue to the facilities the Hazardous Waste Facility Installation and Operation Permits approved for issuance by resolution of the Board, and
- b. Have signing authority indicating that such action has been approved by the Board.

NOW THEREFORE, A HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT IS ISSUED TO THE Applicant for the facility, subject to the Terms and Conditions attached hereto and incorporated herein.

FOR THE BOARD, BY  
ORDER OF THE BOARD

Peggy J. Vance Dec. 17, 1981

Entered into the Journal of the Board on Dec. 17 \_\_, 1981 by

Madeline Samson/sec.

HAZARADOUS WASTE FACILITY  
APPROVAL BOARD

DEC 17 1981

ENTERED BOARD'S JOURNAL



## I. STANDARD CONDITIONS

### A. EFFECT OF PERMIT

The Permittee is allowed to treat and store hazardous waste in accordance with the conditions of this permit. Any treatment or storage of hazardous waste not authorized in this permit is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement with Subtitle C of RCRA. Issuance of this permit does not convey property rights or any sort of any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9606 (a), commonly known as CERCLA), or any other law providing for protection of public health or the environment.

### B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 270.41, 270.42, and 270.43. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated non-compliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

### C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

### D. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such non-compliance is authorized by an emergency permit. Any permit non-compliance, other than non-compliance-authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application, or other appropriate action.

2. Duty to Reapply. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires, unless permission for a later date has been granted by the Regional Administrator.
3. Permit Expiration. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 40 CFR 270.13 - 270.29) and through no fault of the Permittee the Regional Administrator has not issued a new permit as set forth in 40 CFR 270.51.
4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
5. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from non-compliance with the conditions of this permit.
6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.
7. Duty to Provide Information. The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.
8. Inspection and Entry. The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials or other documents as may be required by law, to:
  - (a) Enter at reasonable times upon the Permittee's premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;



- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- (d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Records.

- (a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846 July 1982; Methods for Chemical Analysis of Water and Waste EPA 600/4-79-020, March 1979; or an equivalent method as specified in the attached Waste Analysis Plan.
- (b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
- (c) Records of the monitoring information shall include:
  - (i) The date(s), exact place, and times of sampling or measurements;
  - (ii) The individual(s) who performed the sampling or measurements;
  - (iii) The date(s) analyses were performed;
  - (iv) The individual(s) who performed the analyses;

(v) The analytical technique(s) or method(s) used; and

(vi) The result(s) of such analyses.

10. Reporting Planned Changes. The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.

11. Certification of Construction or Modification. The Permittee may not commence \_\_\_\_\_ of hazardous waste at the facility until:

(a) The Permittee has submitted to the Regional Administrator by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and

(b) (i) The Regional Administrator has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or

(ii) The Regional Administrator has either waived the inspection or has not within 15 days notified the Permittee of his or her intent to inspect.

[NOTE: This condition only applies to newly permitted facilities or to permitted facilities which have been modified.]

12. Anticipated Noncompliance. The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in non-compliance with permit requirements. Such notice does not constitute a waiver of the Permittee's duty to comply with permit requirements.

13. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR 270.41(b)(2) or 270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.

14. Compliance Schedules. Reports of compliance or non-compliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

15. Twenty-four Hour Reporting. The Permittee shall report to the Regional Administrator any non-compliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:
- (a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.
  - (b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:
    - (i) Name, address, and telephone number of the owner or operator;
    - (ii) Name, address, and telephone number of the facility;
    - (iii) Date, time, and type of incident;
    - (iv) Name and quantity of materials involved;
    - (v) The extent of injuries, if any;
    - (vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and
    - (vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the non-compliance and its cause; the periods of non-compliance (including exact dates and times); whether the non-compliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the non-compliance. The Permittee need not comply with the five day written notice requirement if the Regional Administrator waives the requirement and the Permittee submits a written report within fifteen days of the time the Permittee becomes aware of the circumstances.

16. Other Noncompliance. The Permittee shall report all other instances of non-compliance not otherwise required to be reported above, at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in condition I.D. 15.
17. Other Information. Whenever the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittee shall promptly submit such facts or information.
18. Submittal of Reports or Other Information. All reports or other information required to be submitted by the terms of this permit shall be sent to:

RCRA Activities  
U.S. EPA, Region V  
P.O. Box A3587  
Chicago, Illinois 60690-3587

- E. Signatory Requirement. All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR 270.11.
- F. Confidential Information. The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR 270.12.
- G. Documents To Be Submitted Prior to Operation.
- H. Documents To Be Maintained at Facility Site. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:
1. Waste analysis plan as required by 40 CFR 264.13 and this permit.
  2. Personnel training documents and records as required by 40 CFR 264.16(d) and this permit.
  3. Contingency plan as required by 40 CFR 264.53(a) and this permit.
  4. Closure plan as required by 40 CFR 264.112(a) and this permit.

5. Cost estimate for facility closure as required by 40 CFR 264.142(d) and this permit.
6. Operating record as required by 40 CFR 264.73 and this permit.
7. Inspection schedules as required by 40 CFR 264.15(b) and this permit.

## II. GENERAL FACILITY CONDITIONS

- A. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.
- B. Required Notice.
1. The Permittee shall notify the Regional Administrator in writing at least four weeks in advance of the date the Permittee expects to receive hazardous waste from a foreign source. Notice of subsequent shipments of the same waste from the same foreign source in the same calendar year is not required.
  2. When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), he must inform the generator in writing that he has the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record. (See Condition II.L.1.)
- C. General Waste Analysis. The Permittee shall follow the procedures described in the attached waste analysis plan, Attachment \_\_\_\_.
- D. Security. The Permittee shall comply with the security provisions of 40 CFR 264.14(b) and (c).
- E. General Inspection Requirements. The Permittee shall follow the inspection schedule, Attachment \_\_\_\_\_. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR 264.15(c). Records of inspections shall be kept as required by 40 CFR 264.15(d).
- F. Personnel Training. The Permittee shall conduct personnel training as required by 40 CFR 264.16. This training program shall follow the attached outline, Attachment \_\_\_\_\_. The Permittee shall maintain training documents and records as required by 40 CFR 264.16(d) and (e).
- G. General Requirements for Ignitable, Reactive, or Incompatible Waste. The Permittee shall comply with the requirements of 40 CFR 264.17(a).
- H. Location Standards.

I. Preparedness and Prevention.

1. Required Information. At a minimum, the Permittee shall equip the facility with the equipment set forth in the contingency plan, Attachment \_\_\_\_\_ as required by 40 CFR 264.32.
2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition as necessary to assure its proper operation in time of emergency. Such testing and maintenance activities set fourth in the inspection schedule, Attachment \_\_\_\_\_.
3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR 264.34.
4. Required Aisle Space. At a minimum, the Permittee shall maintain aisle space as required by 40 CFR 264.35.
5. Arrangements with Local Authorities. The Permittee shall attempt to make arrangements with State and local authorities as required by 40 CFR 264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

J. Contingency Plan.

1. Implementation of Plan. The Permittee shall immediately carry out the provisions of the contingency plan, Attachment \_\_\_\_\_, and follow the emergency procedures described by 40 CFR 264.56 whenever there is a fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment.
2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR 264.53.
3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the contingency plan as required by 40 CFR 264.54.
4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR 264.55, concerning the emergency coordinator.

K. Manifest System. The Permittee shall comply with the manifest requirements of 40 CFR 264.71, 264.72, and 264.76.

L. Recordkeeping and Reporting.

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR 264.73(a), (b)(1), (2), (3), (4), (5), (6), (7) and (8).
2. Biennial Report. The Permittee shall comply with the biennial report requirements of 40 CFR 264.75.

M. Closure.

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR 264.111 and in accordance with the closure plan, Attachment \_\_\_\_\_.
2. Amendment to Closure Plan. The Permittee shall amend the closure plan in accordance with 40 CFR 264.112(b) whenever necessary.
3. Notification of Closure. The Permittee shall notify the Regional Administrator at least 180 days prior to the date he expects to begin closure.
4. Time Allowed for Closure. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, Attachment \_\_\_\_\_. After receiving the final volume of hazardous waste, the Permittee shall complete closure activities in accordance with the schedule specified in the closure plan, Attachment \_\_\_\_\_.
5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate and/or dispose of all facility equipment as required by 40 CFR 264.114 and the closure plan, Attachment \_\_\_\_\_.
6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by 40 CFR 264.115.



N. Cost Estimate for Facility Closure. The Permittee's original closure cost estimate, prepared in accordance with 40 CFR 264.142(a), is specified in Attachment \_\_\_\_\_.

1. The Permittee must adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared, as required by 40 CFR 264.142(b).
2. The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan as required by 40 CFR 264.142(c).
3. The Permittee must keep at the facility the latest closure cost estimate as required by 40 CFR 264.142(d).

O. Financial Assurance for Facility Closure. The Permittee shall demonstrate continuous compliance with 40 CFR 264.143 by providing documentation of financial assurance, as required by 40 CFR 264.151, in at least the amount of the cost estimates required by permit condition II.N. Changes in financial assurance mechanisms must be approved by the Regional Administrator pursuant to 40 CFR 264.143.

P. Liability Requirements. The Permittee shall demonstrate continuous compliance with 40 CFR 264.147 and the documentation requirements of 40 CFR 264.151, including the requirements to have and maintain liability coverage for sudden and accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs.

Q. Incapacity of Owners or Operators, Guarantors, or Financial Institutions.

The Permittee shall comply with 40 CFR 264.148 whenever necessary.

### III. STORAGE IN CONTAINERS

- A. Waste Identification. The Permittee may store a total volume of 55,000 gallons of the following wastes in containers at the facility, subject to the terms of this permit:

|      |      |      |      |      |
|------|------|------|------|------|
| D001 | F004 | U031 | U121 | U213 |
| F001 | F005 | U037 | U140 | U220 |
| F002 | U002 | U052 | U154 | U226 |
| F003 | U019 | U080 | U159 | U239 |
|      |      | U112 | U161 |      |

- B. Condition of Containers. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit.
- C. Compatibility of Waste with Containers. The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 40 CFR 264.172.
- D. Management of Containers. The Permittee shall manage containers as required by 40 CFR 264.173.
- E. Containment. The Permittee shall maintain the containment system in accordance with the requirements of 40 CFR 264.175 as specified in the attached plans and specifications, Attachment \_\_\_\_\_.
- F. Special Requirements for Ignitable or Reactive Waste. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.
- G. Special Requirements for Incompatible Waste.
1. Prior to placing incompatible wastes or incompatible wastes and materials in the same container, the Permittee shall comply with 40 CFR 264.17(b) as specified in Attachment \_\_\_\_\_.
  2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.
  3. The Permittee shall separate containers of incompatible wastes as indicated in the attached plans, Attachment \_\_\_\_\_, as required by 40 CFR 264.177(c).
  4. The Permittee must document compliance with III.G. (1) and (2) as required by 40 CFR 264.17(c) and place this documentation in the operating record (condition II.L.1).

#### IV. STORAGE IN TANKS

- A. Waste Identification. The Permittee may store a total volume of 98,000 gallons of the following hazardous wastes in tanks, subject to the terms of this permit:

|      |      |      |      |      |      |
|------|------|------|------|------|------|
| D001 | F004 | U031 | U112 | U159 | U226 |
| F001 | F005 | U037 | U121 | U161 | U239 |
| F002 | U002 | U052 | U140 | U213 |      |
| F003 | U019 | U080 | U154 | U220 |      |

- B. Design of Tanks. The Permittee shall contract, operate and maintain all tanks as required by 40 CFR 264.191, as specified in the attached plans and specifications, Attachment \_\_\_\_\_. The Permittee shall maintain the minimum shell thickness specified below at all times to ensure sufficient shell strength.

C. General Operating Requirements.

1. The Permittee shall protect tanks from accelerated corrosion, erosion or abrasion as required by 40 CFR 264.192(a), as specified in Attachment \_\_\_\_\_.
2. The Permittee shall prevent overfilling of tanks, as required by 40 CFR 264.192(b), by the method specified in Attachment \_\_\_\_\_.

D. Special Requirements for Ignitable or Reactive Wastes.

1. The Permittee shall not place ignitable or reactive waste in a tank unless the procedures described in Attachment \_\_\_\_\_ are followed, as required by 40 CFR 264.198(a).
2. The Permittee shall document compliance with IV.D.1. as required by 40 CFR 264.17(c) and place this documentation in the operating record (condition II.L.1).
3. The Permittee shall maintain buffer zones around covered tanks as specified in Attachment \_\_\_\_\_, as required by 40 CFR 264.198(b).

E. Special Requirements for Incompatible Wastes.

1. The Permittee shall not place incompatible wastes in the same tank or place hazardous waste in a tank that previously held an incompatible waste or material unless the procedures specified in Attachment \_\_\_\_\_ are followed, as required by 40 CFR 264.17(b).
2. The Permittee shall document compliance with IV.E.1 as required by 40 CFR 264.17(c) and place this documentation in the operating record (Condition II.L.1).

SIGNATURE PAGE

Signature: \_\_\_\_\_

Basil G. Constantelos, Director  
Waste Management Division

Date: \_\_\_\_\_

1279T

## Hukill Chemical

Hukill Chemical Corporation (EPA No. OHD001926740) is located at 7013 Krick Road in Bedford, Ohio in Cuyahoga County. The facility is a chemical distribution and solvent recovery facility. As such, it needs a RCRA hazardous waste permit for 55,000 gallons of storage in containers, a total of 98,000 gallons of storage in 8 tanks and, 1650 gallons/day of treatment. While most of the wastes are hazardous because they exhibit the characteristic of ignitability or are from non-specific sources such as spent degreasing solvents, some of the wastes are specifically identified as toxic. Hazardous waste brought to Hukill for reclamation usually contain industrial solvents, and undesirable material such as paint, polymers, or colorbodies. The recycling/reclamation of these wastes leads to the resale of two basic products. One product is a distilled solvent sold for use in cleaning, washing, formulating, etc. The other product is a supplement for fuel sold under trade name of Chem Fuel. The two unmarketable byproducts of Hukill operations are distilled water containing less than 1% solvent, and dirty solvents or distillation bottoms that do not meet Chem Fuel specifications. The distilled water is transported to an EPA approved wastewater treatment facility. The dirty solvents or distilled bottoms are either solidified and sent to an EPA approved landfill or sent to an EPA approved destruction facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

Name of Permittee: Hukill Chemical Corporation

Facility Location: 7013 Krick Road, Bedford, Ohio

EPA Identification Number: OHD001926740

Effective Date:

Expiration Date:

Authorization Activities

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (EPA) (codified and to be codified in Title 40 of the Code of Federal Regulations), a permit is issued to Hukill Chemical Corporation (hereafter called the Permittee), to operate a hazardous waste treatment and storage facility located in Bedford, Ohio, at latitude 41:22:022 and longitude 081:31:045. You are authorized to conduct the following hazardous waste management activities.

|   |   |  |
|---|---|--|
| <input checked="" type="checkbox"/> Storage   | <input checked="" type="checkbox"/> Treatment | <input type="checkbox"/> Disposal            |
| <input checked="" type="checkbox"/> Container | <input type="checkbox"/> Tank                 | <input type="checkbox"/> Injection Well      |
| <input checked="" type="checkbox"/> Tank      | <input type="checkbox"/> Surface Impoundment  | <input type="checkbox"/> Landfill            |
| <input type="checkbox"/> Waste Pile           | <input type="checkbox"/> Incenerator          | <input type="checkbox"/> Land Application    |
| <input type="checkbox"/> Surface Impoundment  | <input checked="" type="checkbox"/> Other     | <input type="checkbox"/> Surface Impoundment |

Applicable Regulations:

The conditions of this permit were developed in accordance with the applicable provisions of 40 CFR Part:

|   |  |   |
|---|--|---|
| <input checked="" type="checkbox"/> 261               | <input checked="" type="checkbox"/> 264, Subpart G | <input type="checkbox"/> 264, Subpart L |
| <input checked="" type="checkbox"/> 262               | <input checked="" type="checkbox"/> 264, Subpart H | <input type="checkbox"/> 264, Subpart M |
| <input checked="" type="checkbox"/> 264, Subparts A-E | <input checked="" type="checkbox"/> 264, Subpart I | <input type="checkbox"/> 264, Subpart N |
| <input type="checkbox"/> 264, Subpart F               | <input checked="" type="checkbox"/> 264, Subpart J | <input checked="" type="checkbox"/> 270 |
|   | <input checked="" type="checkbox"/> 264, Subpart K |   |

Permit Approval

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264 and 270 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit. (See 40 CFR §270.32(c).)

This permit is based on the assumption that the information submitted in the permit application attached to the Permittee's letter dated November 9, 1982, and any subsequent amendments (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 CFR §270.41, §270.42 and §270.43) and potential enforcement action. The Permittee must inform EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of \_\_\_\_\_, and shall remain in effect until \_\_\_\_\_, unless revoked and reissued, or terminated (40 CFR §270.41 and .43) or continued in accordance with §270.51.

Issued this \_\_\_\_\_ day of \_\_\_\_\_

by \_\_\_\_\_

Basil G. Constantelos, Director  
Waste Management Division

## STATEMENT OF BASIS

Hukill Chemical Corporation  
OHD001926740

This is a statement of the basis for the Draft Hazardous Waste Permit for the subject facility. It briefly describes the derivation of the conditions of the draft permit and the reasons for them. Under 40 CFR 124.7 (Title 40 of the code of Federal regulations, Section 124.7), the Statement of Basis is sent to the applicant and to any other person who requests it.

### A. FACILITY DESCRIPTION

#### 1. RCRA Activities

The facility is a chemical distribution and solvent recovery facility. As such, it needs RCRA hazardous waste permit for 55,000 gallons of storage in containers, a total of 98,000 gallons of storage in 8 tanks, and 1650 gallons/day of treatment. While most of the wastes are hazardous because they exhibit the characteristics of ignitability or are from, non-specific sources such as spent degreasing solvents, some of the wastes are specifically identified as toxic. The resalable products of Hukill's recycling/reclamation are distilled solvent and a supplement for fuel sold under the trade name of Chem Fuel.

#### 2. Permit Actions Other Than RCRA

##### a. Water

NPDES Permit Number 31F00036



b. Air

c. Other Federal Acts Considered

Hukill Chemical Corporation will not require other permits to satisfy any other Federal acts. The facility will not have any adverse effect on the historical, architectural, archeological or cultural characteristics of the properties either listed or eligible for listing on the National Register for Historical Places.

B. PERMIT APPLICATION

The permit application cited herein is the November 9, 1982 application along with any subsequent amendments.

C. PURPOSE OF THE PERMITTING PROCESS

The purpose of the permitting process is to afford the United States Environmental Protection Agency (U.S. EPA), interested citizens and other governmental agencies the opportunity to evaluate the ability of the applicant to comply with the applicable hazardous waste management requirements under the Resource Conservation and Recovery Act (RCRA). The U.S. EPA is required to prepare a draft permit which sets forth in one concise document all the applicable requirements with which the Agency intends to require the Permittee to comply during the ten year duration of the permit.

#### D. PROCEDURES FOR REACHING A FINAL DECISION

Under Section 7004(b) of RCRA and 40 CFR §124.10, the public is given forty-five days to review the application and comment on the draft permit conditions prior to EPA taking any final permitting action on the application for a hazardous waste management permit. The comment period will begin on the date of publication of the public notice in a major local newspaper of general circulation. When the Regional Administrator of the U.S. EPA makes his final permit decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit decision. If none of the comments received requested a change in the draft permit conditions, the permit will become effective immediately upon issuance of the permit. If comments received during comment period requested changes in the draft permit conditions then the final permit will become effective thirty (30) days after service of notice of the decision or at a later date if review is requested under 40 CFR §124.19.

The issuance of a Hazardous Waste Permit will be coordinated by both U.S. EPA and the Ohio Environmental Protection Agency (OEPA). At this time each Agency has regulations which require a permit to be issued for all facilities which treat, store, or dispose of hazardous waste. If the State receives Phase II interim authorization for the hazardous waste program, the State will assume the administration of the Federal hazardous waste permitting program and this permit.

#### E. BRIEF SUMMARY OF THE PERMIT CONDITIONS

This Section provides a brief summary of the permit conditions in the draft permit. The column titled "Regulation" provides the regulatory authority for the permit condition specified in the column titled "Permit Condition."